

## **EXHIBIT 9**



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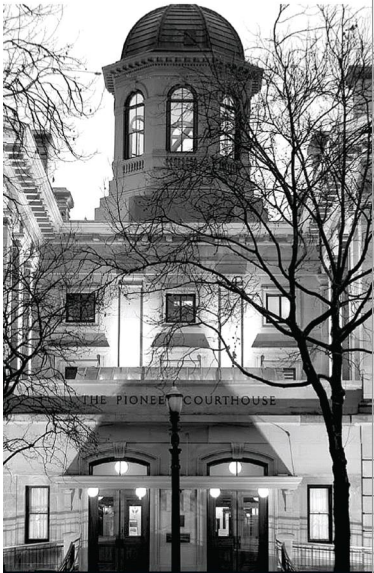
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**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ROY STEWART MOORE, et al.,

Plaintiffs,

v.

Index No. 19 Civ. 4977 (ALC)

SACHA BARON COHEN, et al.,

Defendants.

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**CONFIDENTIAL**

**REMOTE VIDEO DEPOSITION BY VIDEOCONFERENCE**

**JENIFER WALLIS**

**TAKEN ON  
THURSDAY, JANUARY 14, 2021  
9:05 A.M.**

**LOS ANGELES, CALIFORNIA**

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1 CERTIFIED QUESTIONS

2

3 PAGE 11 LINE 24

4 Q. What is your understanding of his work?

5

6 PAGE 19 LINE 12

7 Q. Now, what is the reason that all of these  
8 companies were created?

9

10 PAGE 23 LINE 6

11 Q. You are aware -- and it gets back to my first  
12 question -- that Sacha Baron Cohen has created  
13 shows where he disguises himself and deceives people  
14 interviews to him. You were aware of that at the time  
15 you created Yerushalayim TV, correct?

16

17 PAGE 32 LINE 21

18 Q. And the reason that you incorporated in  
19 with limited public information is because you wanted to  
20 keep as much secret about what Sacha Baron Cohen and his  
21 companies were doing at that time?

22

23

24

25

1 CERTIFIED QUESTIONS CONTINUED

2

3 PAGE 37 LINE 16

4 Q. All right, let me get to this. The purpose of  
5 this registration was to prevent disclosure of the  
6 behind all of these companies was the owner, Sacha Baron  
7 Cohen?

8

9 PAGE 37 LINE 25

10 Q. In fact, you were told by your client to  
11 that Sacha Baron Cohen's name was never associated with  
12 Yerushalayim TV or any of these companies?

13

14 PAGE 40 LINE 12

15 Q. Given the fact that Sacha Baron Cohen was  
16 involved, did that not cause you concern that he was  
17 to use this company to create false impression upon  
18 that he interviewed?

19

20 PAGE 40 LINE 20

21 Q. Doesn't concern you that concealing the true  
22 owners of the company can give rise to the potential for  
23 fraud?

24

25

1 CERTIFIED QUESTIONS CONTINUED

2

3 PAGE 77 LINE 14

4 Q. At the time that you formed Yerushalayim TV,  
5 you told what it was going to be used for?

6

7 PAGE 77 LINE 24

8 Q. Are you aware that to lure people to be on  
9 (sic) is America, they were told that the show was being  
10 called modern American icons?

11

12 PAGE 78 LINE 16

13 Q. Isn't it an improper purpose to use  
14 TV to trick people to be interviewed?

15

16

17

18

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20

21

22

23

24

25



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1 **CONFIDENTIAL**

2 **REMOTE VIDEO DEPOSITION BY VIDEOCONFERENCE**

3 **JENIFER WALLIS**

4 **TAKEN ON**

5 **THURSDAY, JANUARY 14, 2021**

6 **9:05 A.M.**

7  
8 **THE VIDEOGRAPHER:** We are on the record.

9 The time is 9:05 a.m., Pacific Standard Time. The  
10 date is January 14th, 2021. This is the beginning  
11 of the deposition of Jenifer Wallis. The case  
12 caption is Moore vs. Cohen. Will counsel please  
13 introduce yourselves and state who you represent?

14 **MR. KLAYMAN:** Larry Klayman. I'm counsel  
15 for the Plaintiffs, Judge Roy Moore and Kayla Moore,  
16 his wife, and we also have Melissa Isaak, who is of  
17 counsel to me and the lawyer for Judge Moore as  
18 well.

19 **MS. MCNAMARA:** And I'm Elizabeth McNamara  
20 of Davis Wright Tremaine. We represent the  
21 Defendants in this action, and I have with me my  
22 colleague, Eric Feder.

23 **THE VIDEOGRAPHER:** Okay. The court  
24 reporter will now swear in the witness.

25 **THE REPORTER:** And Counsels, just before I

1 swear in the witness, because the nature of this  
2 deposition is remote, I'd just like to stipulate for  
3 the record that the swearing in and testimony will  
4 be captured remotely and that all present agree to  
5 this method of preserving today's record. The  
6 testimony will be transcribed and certified. Mr.  
7 Klayman, do you agree?

8 **MR. KLAYMAN:** We agree.

9 **THE REPORTER:** Ms. McNamara, do you agree?

10 **MS. MCNAMARA:** We agree, thank you.

11 **THE REPORTER:** Not a problem. With that,  
12 may I please have you raise your right hand, Ms.  
13 Wallis? Do you solemnly swear or affirm, under the  
14 penalty of perjury, that you are Jenifer Wallis and  
15 that the testimony you're about to provide will be  
16 the truth, the whole truth and nothing but the  
17 truth?

18 **THE WITNESS:** I do.

19 **THE REPORTER:** Thank you.

20 **JENIFER WALLIS,** having been duly sworn, was  
21 examined, and testified as follows:

22 **EXAMINATION**

23 **BY MR. KLAYMAN:**

24 **Q. Ms. Wallis, I'm legal counsel in this**  
25 **lawsuit for Judge Roy Moore and his wife, Kayla**

1 transcript?

2 **MR. KLAYMAN:** Yes, mark is as Exhibit 1,  
3 but if you may also put it up on the screen.

4 **(Whereupon, Exhibit 1 was marked for**  
5 **identification.)**

6 **THE VIDEOGRAPHER:** Can you see that, Mr.  
7 Klayman?

8 **MR. KLAYMAN:** Yes, I can.

9 **BY MR. KLAYMAN:**

10 **Q. And Ms. Wallis, you've seen this document**  
11 **before, have you not, a standard consent agreement?**

12 **A.** I -- only first saw it in deposition  
13 preparation with my counsel. I had not previously  
14 seen it.

15 **Q. Do you know who drafted this agreement on**  
16 **behalf of --**

17 **A.** I do -- I do not. I did not draft this  
18 agreement.

19 **Q. Have you ever heard of these companies,**  
20 **Greenpark Television?**

21 **A.** Yes.

22 **Q. And in what context do you know of**  
23 **Greenpark Television?**

24 **A.** Greenpark Television is the single member  
25 of a company I created, Yerushalayim Television,

1 LLC.

2 Q. What do you mean that it's a single  
3 member?

4 A. It is the sole owner of the LLC that I  
5 created, called Yerushalayim Television, LLC.

6 Q. And the owner of Greenpark Television is  
7 Sacha Baron Cohen, correct?

8 A. The owner of Greenpark Television is La  
9 Quinta, LLC.

10 Q. La Quinta is owned by Sacha Baron Cohen?

11 A. La Quinta is owned by Please You Can  
12 Touch, LLC. That is owned by Sacha Baron Cohen.

13 Q. Now, what is the reason that all of these  
14 companies were created?

15 MS. MCNAMARA: Objection and instruct the  
16 witness not to answer.

17 MR. KLAYMAN: Certify it.

18 BY MR. KLAYMAN:

19 Q. These companies were created to insulate  
20 Baron Cohen from potential liability, correct? To  
21 make any plaintiff have to go through a number of  
22 different groups before they would reach him  
23 personally, correct?

24 MS. MCNAMARA: I think the witness can  
25 explain what an LLC means, if that's --

1 whether or not, with all of these different chains  
2 of ownership, that a fraud was being committed?

3 A. No, as a corporate attorney my job is to  
4 create the corporate entity. I'm not in-house  
5 counsel. My job is simply to create the corporate  
6 entity.

7 Q. Did you have communications with lawyers  
8 for any of these companies in incorporating  
9 Yerushalayim TV?

10 A. No, I don't believe so.

11 Q. Now, you used your office address as the  
12 contact address for Yerushalayim TV, correct?

13 A. I don't recall. I would have to see the  
14 articles of incorporation.

15 Q. All right, well, let's go through them.  
16 Let's first -- I turn your attention to Defendants'  
17 Bates number 1.

18 THE VIDEOGRAPHER: One moment, sir.

19 THE REPORTER: And Mr. Klayman, we'll be  
20 marking this as an exhibit as well, sir?

21 MR. KLAYMAN: Yes, Exhibit 2.

22 (Whereupon, Exhibit 2 was marked for  
23 identification.)

24 THE REPORTER: I will continue on from  
25 there.

1           **THE VIDEOGRAPHER:** Can you see the  
2 document, sir?

3           **MR. KLAYMAN:** Yes.

4 **BY MR. KLAYMAN:**

5           **Q. You see that document?**

6           A. Yes.

7           **Q. What does this document reflect?**

8           A. It is the articles of organization for  
9 Yerushalayim Television, LLC.

10          **Q. And your name appears at the bottom,**  
11 **correct?**

12          A. I can't see the bottom.

13          **Q. All right, well, let's scroll down.**

14          A. Yes.

15          **Q. On what basis is your name appearing on**  
16 **this document?**

17          A. As the attorney of record and organizer of  
18 the LLC.

19          **Q. Now, the principal office address, which**  
20 **is listed at Roman numeral four, is that your**  
21 **address? That was your office address?**

22          A. No.

23          **Q. What address is that? Who resides -- who**  
24 **or what resides at that address?**

25          A. That was the principal office address of



1 Q. Next turn to Defendants' Bates number 6  
2 and 7.

3 THE REPORTER: And Counsel, if I assume  
4 correctly, this would be Exhibit 3?

5 MR. KLAYMAN: Yes.

6 (Whereupon, Exhibit 3 was marked for  
7 identification.)

8 THE VIDEOGRAPHER: Can you see the  
9 document, sir?

10 MR. KLAYMAN: Yes.

11 BY MR. KLAYMAN:

12 Q. Ms. Wallis, do you want to see the entire  
13 document? Just scroll down so you can familiarize  
14 yourself with it again. Okay, Ms. Wallis, you --

15 MR. KLAYMAN: I'll ask this be marked  
16 Exhibit 3, and it consists of Bates number 6 through  
17 9.

18 BY MR. KLAYMAN:

19 Q. You prepared this document, did you not,  
20 Ms. Wallis?

21 A. Yeah.

22 Q. And under part 5, where it says -- you can  
23 see it right there -- the current directors,  
24 officers, limited liability company managers,  
25 managing partners, trustees or persons serving in a

1 deposition.

2 **MR. KLAYMAN:** Certify all these questions.

3 I turn your attention to what I'll ask the court  
4 reporter to mark as Exhibit 5. It's Bates numbers  
5 14 and 15 of documents produced by the Defendants.

6 **(Whereupon, Exhibit 5 was marked for**  
7 **identification.)**

8 **BY MR. KLAYMAN:**

9 **Q. What is this document, Ms. Wallis?**

10 A. That is the limited liability company  
11 annual report for Yerushalayim Television, LLC, in  
12 Wyoming.

13 **Q. And it's dated October 1st, 2018, correct?**

14 A. It seems -- it seems it was November 14th,  
15 2018.

16 **Q. And you created this document?**

17 A. Yes.

18 **Q. And you filed it?**

19 A. Correct.

20 **Q. On or about November 14th, 2018?**

21 A. Yes.

22 **Q. This document reflects no economic**  
23 **activity on behalf of Yerushalayim TV, correct?**

24 A. I don't believe there's a place for that  
25 in this document.

1 of ethics of the State Bar of California and  
2 Alabama, have you ever felt any responsibility with  
3 regard to Yerushalayim TV being used to deceive  
4 Judge Roy Moore?

5 MS. MCNAMARA: Objection to form. You can  
6 answer that question.

7 A. My answer is no.

8 BY MR. KLAYMAN:

9 Q. Did there come a point in time when  
10 Yerushalayim TV ceased to exist?

11 A. Yes.

12 Q. When was that?

13 A. I do not recall.

14 Q. What were the circumstances upon which it  
15 ceased to exist?

16 A. Once the annual filings are no longer  
17 filed, it's administratively dissolved by the state  
18 of formation.

19 Q. You were instructed to make no further  
20 administrative filings on behalf of Yerushalayim TV?

21 A. I believe that calls for attorney-client  
22 privileged communication.

23 Q. Okay. So you made no further filings on  
24 behalf of Yerushalayim TV?

25 A. Correct.

1 Q. And when was it dissolved by the State of  
2 Wyoming?

3 A. I do not recall.

4 MR. KLAYMAN: I turn your attention to  
5 Defendants' Bates number 32. We'll mark that as  
6 Exhibit 6.

7 (Whereupon, Exhibit 6 was marked for  
8 identification.)

9 BY MR. KLAYMAN:

10 Q. Have you seen that document before, Ms.  
11 Wallis?

12 A. Yes.

13 Q. Did you create this document?

14 A. No.

15 Q. Who did?

16 A. I -- you would have to scroll to the  
17 bottom of the page.

18 Q. Okay.

19 A. It appears Wendy Heller created that  
20 document.

21 Q. Who is Wendy Heller?

22 A. I do not know.

23 Q. Did there come a point in time when you  
24 were terminated by Yerushalayim TV?

25 A. No.

1       **Q.    Why is it that you didn't play a role in**  
2 **creating this document, which are titled Secretary**  
3 **of State articles of organization, dated May 23rd,**  
4 **2017?**

5       A.    I don't know. I don't believe I had been  
6 hired at that point.

7       **Q.    Who is Howard Altman?**

8       A.    I'm not sure. I don't -- I've never had  
9 any interaction with Howard Altman, I don't believe.

10       **Q.    All right. This document pertains to**  
11 **Greenpark Television, correct, not Yerushalayim TV?**

12       A.    Correct.

13       **Q.    But Greenpark Television is the owner, at**  
14 **least as listed, of Yerushalayim TV?**

15       A.    Correct. It's the sole member of  
16 Yerushalayim Television, LLC.

17       **Q.    Is Howard Altman a lawyer?**

18       A.    I don't know.

19       **Q.    Is Wendy Heller a lawyer?**

20       A.    I don't know.

21       **Q.    And you've never seen this document**  
22 **before?**

23       A.    I said I had seen this document.

24       **Q.    And when did you see it?**

25       A.    When I was checking the corporate

1 structure of those entities that I was creating the  
2 subsidiary for, so it would have been around the  
3 time that I was creating Yerushalayim Television.

4 **Q. Did you check to see whether or not**  
5 **Greenpark Television was an active corporation?**

6 A. Yes, and I believe we obtained a copy of  
7 this from the client, and also from the California  
8 Secretary of State website.

9 **MR. KLAYMAN:** I turn your attention to  
10 Defendants' Bates number 33, and I'll ask it be  
11 marked as Exhibit 7, Plaintiffs' Exhibit 7.

12 **(Whereupon, Exhibit 7 was marked for**  
13 **identification.)**

14 **BY MR. KLAYMAN:**

15 **Q. Have you seen this document before?**

16 A. Yes. Isn't this the same document we just  
17 looked at?

18 **Q. No.**

19 A. Okay. Yes, I have seen this.

20 **Q. When did you see it?**

21 A. The same time when I would have been  
22 forming Yerushalayim Television, LLC as a subsidiary  
23 of Greenpark.

24 **Q. Now, look at part 5. That reflects La**  
25 **Quinta Entertainment, LLC is the owner of Greenpark**

1 **Television, correct?**

2 A. Correct.

3 **MR. KLAYMAN:** I'll turn your attention to  
4 what I'll ask to be marked as Exhibit 8. That's  
5 Bates numbers 34 and 35.

6 (Whereupon, Exhibit 8 was marked for  
7 identification.)

8 **BY MR. KLAYMAN:**

9 Q. Have you seen that document before?

10 A. Yes.

11 Q. And when did you see it?

12 A. Around the time that I was forming  
13 Yerushalayim Television, LLC.

14 Q. Did you ever (audio cutout)?

15 A. I'm sorry, you -- your question blanked  
16 out.

17 **THE VIDEOGRAPHER:** Yes, Counsel, the  
18 beginning.

19 **MR. KLAYMAN:** All right.

20 **BY MR. KLAYMAN:**

21 Q. This document, Exhibit 8, reflects the  
22 assignment of an EIN, employer identification  
23 number, for Greenpark Television, correct?

24 A. Correct.

25 Q. I take it Yerushalayim TV never got an EIN

1 **number, to the best of your knowledge?**

2 A. I did not obtain one. I don't know if it  
3 ever did.

4 **MR. KLAYMAN:** I'll turn your attention to  
5 what I'll have marked as Exhibit 9. That's Bates  
6 number 36.

7 **(Whereupon, Exhibit 9 was marked for**  
8 **identification.)**

9 **BY MR. KLAYMAN:**

10 Q. Have you seen that document before? It's  
11 Secretary of State articles of organization, State  
12 of California, Secretary of State, March 30th, 2017.

13 A. Yes.

14 Q. And when did you see it? When did you  
15 first come to learn?

16 A. Around the time that I was creating  
17 Yerushalayim Television, LLC.

18 Q. And that pertains to La Quinta  
19 Entertainment, LLC, correct?

20 A. Correct.

21 Q. Do you know whether any -- at the time  
22 that Yerushalayim TV was being created, what law  
23 firm, again, were you working for, or was it your  
24 own law firm?

25 A. Manning & Kass, Ellrod, Ramirez, Trester



1 in their downtown L.A. office.

2 Q. Did anyone else from that law firm play  
3 any role in the incorporation of Yerushalayim TV?

4 A. No.

5 Q. Did any person, to the best of your  
6 knowledge in that law firm have anything to do with  
7 La Quinta or Please You Can Touch, LLC or Greenpark  
8 Television?

9 A. No.

10 MR. KLAYMAN: Did I have that document  
11 marked that I just referred to, Court Reporter?

12 THE REPORTER: Yes, sir, Exhibit 9. It  
13 should have been Bates stamped numbers 36, sir.

14 MR. KLAYMAN: Okay. I'll turn your  
15 attention to Bates number 37, which is Exhibit 10.  
16 I'll ask it be marked Exhibit 10 to this deposition.

17 (Whereupon, Exhibit 10 was marked for  
18 identification.)

19 BY MR. KLAYMAN:

20 Q. Have you seen that document before? This  
21 is a Secretary of State statement of information,  
22 limited liability company, filed with the California  
23 Secretary of State on April 17th, 2017.

24 A. Yes.

25 Q. When did you come -- (audio cutout) to

1 **your knowledge?**

2 A. Can you repeat your question? You blanked

3 --

4 **Q. When did you --**

5 A. -- out again.

6 **Q. When did you first learn of this document?**

7 **When did you first see it?**

8 A. The same time as the others. Around the  
9 time that I was creating Yerushalayim Television,  
10 LLC.

11 **Q. And this document reflects the Please You**  
12 **Can Touch, LLC as the owner of La Quinta**  
13 **Entertainment, LLC?**

14 A. Correct.

15 **Q. And the address is 9100 Wilshire**  
16 **Boulevard?**

17 A. Correct.

18 **Q. And the same address for Please You Can**  
19 **Touch?**

20 A. Correct.

21 **Q. Who, if anyone, resides at that address or**  
22 **at least does business at that address?**

23 A. I do not know. Apparently La Quinta  
24 Entertainment and Please You Can Touch.

25 **Q. You know of any person who does business**

1 (Whereupon, Exhibit 11 was marked for  
2 identification.)

3 BY MR. KLAYMAN:

4 Q. Have you seen that document before, Ms.  
5 Wallis?

6 MR. KLAYMAN: Can you put that up on the  
7 screen?

8 A. Yes.

9 BY MR. KLAYMAN:

10 Q. And you saw that in and around the time  
11 that you formed Yerushalayim TV?

12 A. Correct.

13 Q. And this document reflects that Please You  
14 Can Touch, LLC is --

15 A. Oh, wait. This says filed January 16th,  
16 2019, so no, I wouldn't have seen this document in  
17 2017.

18 Q. Have you ever seen this document before?

19 A. I don't recall.

20 Q. This document reflects that La Quinta is  
21 owned by Please You Can Touch, LLC as you previously  
22 testified, correct?

23 A. Yes.

24 MR. KLAYMAN: I'll ask the court reporter  
25 to mark the next document Exhibit 12, Bates numbers

1 39, through and including 44.

2 (Whereupon, Exhibit 12 was marked for  
3 identification.)

4 BY MR. KLAYMAN:

5 Q. This is a document, an operating agreement  
6 of La Quinta Entertainment, LLC. Did you see this  
7 document in and around the time you formed  
8 Yerushalayim TV?

9 A. Yes.

10 Q. And turn to Bates number 42 of this  
11 document, which is Exhibit 12 -- we marked it as  
12 Exhibit 12, Plaintiffs' deposition. Section 8.1, to  
13 the extent not inconsistent with applicable law,  
14 neither the member nor any of the member's officers,  
15 directors, employees, partners, members,  
16 shareholders, or affiliates shall be liable,  
17 responsible or accountable in damages or otherwise  
18 to the company for any operations of the company.  
19 If the person acted in good faith and in a manner  
20 the person reasonably believed to be in or not  
21 opposed to the best interest of the company, and  
22 with respect to any criminal action or proceeding,  
23 had no reasonable cause to believe the person's  
24 conduct was unlawful.

25 You reviewed this document at the time

1 that you were forming Yerushalayim TV, correct?

2 A. Correct.

3 Q. Did you make an inquiry, with regard to  
4 Section 8.1, as to whether the purpose of all of  
5 these companies that stood behind Yerushalayim TV  
6 were engaged in bad faith, unlawful or criminal  
7 activity?

8 A. No, that's a common provision in operating  
9 agreements that I've seen in almost every operating  
10 agreement that I've dealt with. It didn't raise any  
11 flags.

12 Q. So you didn't ask any questions as to  
13 whether Yerushalayim TV was being used for any bad  
14 faith, illegal or criminal activity?

15 A. No.

16 MR. KLAYMAN: I'll turn your attention to,  
17 and I'll ask the court reporter to make as Exhibit  
18 13, this is a State of California, Secretary of  
19 State limited liability articles of organization  
20 with regard to Please You Can Touch, LLC.

21 (Whereupon, Exhibit 13 was marked for  
22 identification.)

23 BY MR. KLAYMAN:

24 Q. Did you see this document in and around  
25 the time that you formed Yerushalayim TV?

1           **MS. MCNAMARA:** You have not given the  
2 Bates number, and so I don't think the court  
3 reporter --

4           **MR. KLAYMAN:** Bates number 45. Bates  
5 number 45.

6           A. Could you repeat your question?

7 **BY MR. KLAYMAN:**

8           **Q. Did you see this document in and around**  
9 **the time that you formed Yerushalayim TV?**

10          A. Yes.

11          **Q. Have you ever heard of the company Four By**  
12 **Two Films, Inc.?**

13          A. Yes.

14          **Q. In what context did you learn of that**  
15 **company?**

16          A. When I was retained to represent Four By  
17 Two Films and its affiliated companies.

18          **Q. Who advised you of Four By Two Films, of**  
19 **its existence?**

20          A. That would have been Todd Schulman.

21          **Q. Four By Two Films is owned by Sacha Baron**  
22 **Cohen, correct?**

23          A. That's my understanding.

24          **Q. And does Four By Two Films own all of**  
25 **these other companies that we've been talking about?**

1           **MR. KLAYMAN:** I turn your attention to  
2 Bates numbers 48, through and including 55.

3           **THE REPORTER:** Exhibit 14, correct,  
4 Counsel?

5           **MR. KLAYMAN:** Yes, Exhibit 14.

6                   (Whereupon, Exhibit 14 was marked for  
7 identification.)

8 **BY MR. KLAYMAN:**

9           **Q.** This is a document styled operating  
10 agreement of Please You Can Touch, LLC. Did you see  
11 and review this document in and around the time that  
12 you incorporated Yerushalayim TV?

13           **A.** Yes.

14           **Q.** Yerushalayim TV was dissolved shortly  
15 after the airing of the show "Who is America?",  
16 correct?

17           **MS. MCNAMARA:** Objection to form.

18           **A.** I don't recall the date of the airing or  
19 the date of dissolution.

20 **BY MR. KLAYMAN:**

21           **Q.** But it was, relatively speaking, shortly  
22 after Who is America --

23           **A.** I don't -- I don't know that it was  
24 shortly thereafter. I don't recall those dates.

25           **Q.** You were instructed to allow that company